

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re	:	Chapter 7
	:	
1121 PIER VILLAGE, LLC	:	Case No. 21-11466 (ELF)
	:	
Debtor.	:	
	:	

**SUPPLEMENTAL AFFIDAVIT OF JEFFREY KURTZMAN, ESQUIRE PURSUANT
TO 11 U.S.C. §327(a) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014(a)**

STATE OF NEW JERSEY	:	
	:	ss.
COUNTY OF CAMDEN	:	

JEFFREY KURTZMAN, ESQUIRE, being duly sworn according to law, hereby deposes and states as follows:

1. I am an attorney admitted to practice law in Pennsylvania, New Jersey and New York and am a partner in Kurtzman | Steady, LLC (“Kurtzman | Steady”), a law firm having offices at 555 City Avenue, Suite 480, Bala Cynwyd, PA 19004, among other locations. I am also admitted to practice in various federal district courts, including the United States District Court for the Eastern District of Pennsylvania.

2. On January 13, 2022, Terry P. Dershaw (the “Trustee”) filed an application to retain Kurtzman | Steady as his counsel under a general retainer (the “Retention Application”) [Doc. No. 382]. In connection with the Retention Application, I submitted an affidavit of disinterestedness reflecting the connections of Kurtzman | Steady to relevant interested parties and the Office of the United States Trustee.

3. On January 31, 2022, this Court entered an order approving the Retention Application [Do. No. 390].

4. On February 3, 2022, the Trustee received an offer to purchase the real property owned by the debtor in a transaction pursuant to section 363(b) and (f) of the Bankruptcy Code from Iron Stone Real Estate Partners or a newly-formed entity affiliated with that entity ("Iron Stone").

5. Kurtzman | Steady has represented Iron Stone in several prior matters, including in connection with the acquisition of assets in the Chapter 11 case of North Philadelphia Health System, Case No. 16-18931 (MDC), in this Court and in the Delaware Chapter 11 cases of Center City Healthcare, LLC and its affiliates.

6. Kurtzman | Steady does not and will not represent Iron Stone in this or any related proceeding and understands that Iron Stone has engaged its own counsel in connection with the prospective sale transaction.

7. I intend to supplement this Affidavit at such time and to the extent that I become aware of any other connections between Kurtzman | Steady and any creditor or interested party in this or any related Chapter 7 case,

8. I acknowledge that I am subject to the penalties of perjury if I have willfully misstated any factual information in connection with this affidavit.

/s/ Jeffrey Kurtzman
JEFFREY KURTZMAN, ESQUIRE

Sworn to and subscribed
before me this 4th day of
February, 2022.

Queen Steady, Atty at Law
Notary Public State of New Jersey